

Juanita R. Brooks (CA SBN 75934)  
brooks@fr.com  
Jason W. Wolff (CA SBN 215819)  
wolff@fr.com  
FISH & RICHARDSON P.C.  
12860 El Camino Real, Ste. 400  
San Diego, CA 92130  
Tel.: (858) 678-5070  
Fax: (858) 678-5099

*Additional counsel listed on  
signature page*

Attorneys for Plaintiff  
FINJAN LLC

DUANE MORRIS LLP  
D. Stuart Bartow (SBN 233107)  
Email: DSBartow@duanemorris.com  
Nicole E. Grigg (SBN 307733)  
Email: NEGrigg@duanemorris.com  
2475 Hanover Street  
Palo Alto, CA 94304-1194  
Tel.: 650.847.4150  
Fax: 650.847.4151

*Additional counsel listed on  
signature page*

Attorneys for Defendant  
SONICWALL, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

FINJAN LLC, a Delaware Limited Liability  
Company,

Plaintiff,

v.

SONICWALL, INC., a Delaware  
Corporation,

Defendant.

Case No. 5:17-cv-04467-BLF (VKD)

**JOINT MOTION AND ~~PROPOSED~~ ORDER  
TO EXTEND TIME FOR SUBMISSION OF  
JURY INSTRUCTIONS AND VERDICT FORM**

1 Plaintiff Finjan LLC (“Finjan”) and Defendant SonicWall, Inc. (“SonicWall”) (collectively,  
2 “the Parties”), respectfully move the Court to extend the time by which the Parties are required to  
3 file the proposed jury instructions and verdict form.

4 Trial in this matter is scheduled to begin on Monday, May 3, 2021, and the final pretrial  
5 conference is set for Thursday, March 18, 2021. D.I. 48. The Court’s Standing Order requires the  
6 Parties to submit the proposed jury instructions and verdict form in this matter by March 11, 2021,  
7 at least 7 days before the final pretrial conference. In light of the Court’s order on SonicWall’s  
8 Motion for Partial Summary Judgment issued on March 5, 2021, and order directing SonicWall to  
9 specify the remaining issues in its pending motion to strike (D.I. 387), the Parties respectfully  
10 request that the Court amend the deadline to file the jury instructions and verdict form to April 9,  
11 2021, to allow the parties to fully assess the orders’ impact on the remaining asserted claims and  
12 patents and, by extension, the scope of the jury instructions, position statements therein, and verdict  
13 form. The Parties still intend to file proposed voir dire and the juror questionnaire on March 11,  
14 2021.

15 The Parties submit that the requested extension of the deadline to file the jury instructions  
16 and verdict form will not impact the Court’s scheduled trial date or the resolution of any outstanding  
17 objections prior to trial, per the Court’s Standing Order for Civil Trials.

Respectfully submitted,

By: /s/ Proshanto Mukherji  
Juanita R. Brooks (CA SBN 75934)  
brooks@fr.com  
Jason W. Wolff (CA SBN 215819)  
wolff@fr.com  
FISH & RICHARDSON P.C.  
12860 El Camino Real, Ste. 400  
San Diego, CA 92130  
Telephone: (858) 678-5070

Proshanto Mukherji (*Pro Hac Vice*)  
mukherji@fr.com  
FISH & RICHARDSON P.C.  
One Marina Park Drive  
Boston, MA 02210  
Telephone: (617) 542-5070

Robert Courtney (CA SNB 248392)  
courtney@fr.com  
FISH & RICHARDSON P.C.  
3200 RBC Plaza  
60 South Sixth Street  
Minneapolis, MN 55402  
Telephone: (612) 335-5070

*Attorneys for Plaintiff*  
FINJAN LLC

Dated: March 8, 2021

Respectfully submitted,

By: /s/ Alice Snedeker  
Matthew C. Gaudet (*Pro Hac Vice*)  
mcgaudet@duanemorris.com  
David C. Dotson (*Pro Hac Vice*)  
dcdotson@duanemorris.com  
Jennifer H. Forte (*Pro Hac Vice*)  
jhforte@duanemorris.com  
Alice E. Snedeker (*Pro Hac Vice*)  
aesnedeker@duanemorris.com  
DUANE MORRIS LLP  
1075 Peachtree NE, Suite 2000  
Atlanta, GA 30309-3929  
Telephone: 404.253.6900

D. Stuart Bartow (SBN 233107)  
Email: DSBartow@duanemorris.com  
Nicole E. Grigg (SBN 307733)  
Email: NEGrigg@duanemorris.com  
DUANE MORRIS LLP  
2475 Hanover Street  
Palo Alto, CA 94304-1194  
Telephone: 650.847.4150

Joseph A. Powers (*Pro Hac Vice*)  
Email: japowers@duanemorris.com  
Jarrad M. Gunther (*Pro Hac Vice*)  
Email: jmgunther@duanemorris.com  
DUANE MORRIS LLP  
30 South 17th Street  
Philadelphia, PA 19103  
Telephone: 215.979.1000

*Attorneys for Defendant*  
SONICWALL, INC.

~~PROPOSED~~ ORDER

Pursuant to Parties' Stipulated Request, the schedule is changed as follows:

Event	Current Deadline	New Deadline
Deadline to file Joint Pretrial Statement & Order (excluding deposition designations)	March 4, 2021	No change
Deadline to file proposed voir dire and juror questionnaire	March 11, 2021	No change
Final pretrial conference	March 18, 2021	No change
Deadline to file Jury Instructions and Verdict Form	March 11, 2021	April 9, 2021
Deadline to file pretrial briefs	April 26, 2021	No change
Trial	May 3, 2021	No change

**IT IS SO ORDERED.**

Dated: March 9, 2021



JUDGE BETH LABSON FREEMAN  
United States District Court Judge